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and for Defendants AEROFLEX INCORPORATED,
AMI SEMICONDUCTOR, INC., MATROX
7 ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
8 CORP., MATROX TECH, INC., and
AEROFLEX COLORADO SPRINGS, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 RICOH COMPANY, LTD.,

14 Plaintiff,

15 vs.

16 AEROFLEX INCORPORATED, AMI
17 SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS LTD., MATROX
18 GRAPHICS INC., MATROX
INTERNATIONAL CORP., MATROX TECH,
19 INC., AND AEROFLEX COLORADO
SPRINGS, INC.

20 Defendants.

21 SYNOPSISYS, INC.,

22 Plaintiff,

23 vs.

24 RICOH COMPANY, LTD.,

25 Defendant.

Case No. C03-4669 MJJ (EMC)

Case No. C03-2289 MJJ (EMC)

**GUIDE TO SYNOPSISYS' AND
CUSTOMER DEFENDANTS' SUMMARY
JUDGMENT MOTIONS**

Date: September 26, 2006

Time: 9:30 a.m.

Courtroom: 11, 19th Floor

Judge: Martin J. Jenkins

1 It is well past time for Ricoh's baseless case to be dismissed. To that end, Synopsys and/or the
 2 Customer Defendants have filed with this Court nine summary judgment motions. Filing such an
 3 overwhelming number of summary judgment motions has been done reluctantly, given the amount of
 4 resources required both on the part of the Court and counsel, but it is necessary in order to prevent an
 5 even greater and unneeded expenditure of resources for a trial on this meritless case. Indeed, many
 6 more summary judgment motions on many more issues could be filed, but the issues presented in these
 7 motions are most appropriate for summary judgment at this point in the case.

8 The issues presented in the majority of the motions are case dispositive. To lessen the burden
 9 on the Court, Synopsys and the Customer Defendants suggest that these dispositive motions should be
 10 considered by the Court in the following order. Should the Court find noninfringement based on
 11 Motion No. 1 or 2, it need not consider Motion No. 3; similarly, should the Court find invalidity
 12 through Motion No. 3, it need not consider Motion No. 4:

- 13 1. Noninfringement based upon the definition of RTL (Dkt. Nos. 568 & 422).¹
- 14 2. Noninfringement based upon the definition of Hardware Cells (Dkt. Nos. 424 & 570).
- 15 3. Invalidity/dismissal based upon the joint inventorship of Dr. Foo (Dkt. Nos. 415 &
 16 553).
- 17 4. Invalidity based upon Kowalski/VDAA references (Dkt. Nos. 421 & 572).
- 18 5. Unenforceability based upon inequitable conduct (Dkt. Nos. 419 & 565).
- 19 6. Noninfringement based upon various arguments (Dkt. Nos. 425 & 571).

20 Although Synopsys and the Customer Defendants are confident that the Court will find one of
 21 these motions (if not all of them) to be sufficient to dispose of this case, in the unlikely event the Court
 22 denies *all* of the above motions, there are three non-dispositive motions filed in the *Ricoh* case that the
 23 Court should consider:

- 24 7. Proper measure of damages (Dkt. No. 554).
- 25 8. Laches (Dkt. No. 556).

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 28 ¹ The docket number in the *Synopsys* case (03-2289) is listed first; the number in the *Ricoh* case (03-4669) is listed second.

1 9. Nonwillfulness (Dkt. No. 552).

2 The non-dispositive motions all deal with the measure of damages potentially available to Ricoh.
3 Should Ricoh's case survive the dispositive motions, a ruling on these three non-dispositive motions
4 would likely facilitate the settlement of the case, as it would give the parties guidance on the potential
5 value of this case.

6 Synopsis and the Customer Defendants respectfully suggest that above is the most efficient
7 way for the Court to tackle the issues raised in the various motions, and they appreciate the Court's
8 consideration of this proposal.

9
10 Dated: August 18, 2006

HOWREY LLP

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12 By: /s/ Denise M. De Mory

13 Denise M. De Mory
14 Attorney for Plaintiff SYNOPSYS, INC.
15 and Defendants AEROFLEX
16 INCORPORATED, AMI
17 SEMICONDUCTOR, INC., MATROX
18 ELECTRONIC SYSTEMS, LTD.,
19 MATROX GRAPHICS INC., MATROX
20 INTERNATIONAL CORP., MATROX
21 TECH, INC., and AEROFLEX
22 COLORADO SPRINGS, INC.
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